

DICKINSON WRIGHT PLLC
John P. Desmond (Nevada Bar No. 5618)
100 West Liberty Street, Suite 940
Reno, NV 89501
Tel: (775) 343-7500
Fax: (844) 670-6009
Email: jdesmond@dickinson-wright.com

DICKINSON WRIGHT PLLC
John R. Nelson (Texas Bar No. 797144)
(Admitted Pro Hac Vice)
Payne Keinarth (Texas Bar No. 24101412)
(Admitted Pro Hac Vice)
607 W. 3rd Street, Suite 2500
Austin, TX 78701-4713
Tel: 512-770-4200
Fax: 844-670-6009
Email: jnelson@dickinson-wright.com
Email: pkeinarth@dickinson-wright.com

RAICH LAW PLLC
Sagar Raich (Nevada Bar No. 13229)
Brian Schneider (Nevada Bar No. 15458)
6785 S. Eastern Ave., Suite 5
Las Vegas, NV 89119
Tel: (702) 758-4240
Email: sraich@raichattorneys.com
Email: bschneider@raichattorneys.com

*Attorneys for Plaintiffs Modern Eminence LLC,
Modern Fortress, Inc. and AllRealms Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MODERN EMINENCE, LLC, MODERN
FORTRESS, INC., AND ALLREALMS,
INC.

Plaintiffs,

vs.

NATHAN PARK

Defendant.

Case No.: 2:24-cv-00348-CDS-EJY

**JOINT MOTION AND ORDER TO
EXTEND DEADLINE TO SUBMIT
DISCOVERY PLAN AND PROPOSED
SCHEDULING ORDER**

1 Plaintiffs Modern Eminence LLC, Modern Fortress, Inc., and AllRealms, Inc.
 2 (“Plaintiffs”), by and through their counsel of record, Payne Keinarth, Esq. with the law firm of
 3 Dickinson Wright PLLC, and Defendant Nathan Park (“Park”) by and through his counsel of
 4 record, Jarrod L. Rickard, Esq. and Katie L. Cannata, Esq. with the law firm of Semenza Rickard
 5 Law, (together, the “Parties”) hereby jointly request an extension of time to submit their
 6 discovery plan and proposed scheduling order for the following reasons:

7 Due to conflicts in schedules around the July 4th holiday, the parties have not yet been
 8 able to confer regarding the likely needs of discovery in the case. They will be able to do so on
 9 or before July 9, 2024. As such, the parties respectfully request that the Court grant this motion
 10 to extend their deadline to file a discovery plan and proposed scheduling order until July 17,
 11 2024.

12 This is the first such request filed with this Court, and it is made in good faith and is not
 13 made for the purpose of delay. The Parties agree that good cause exists for this continuance.

14 DATED this 3rd day of July, 2024

DATED this 3rd day of July, 2024

15 DICKINSON WRIGHT PLLC

SEMENZA RICKARD LAW

17 /s/ Payne Keinarth
 18 Payne Keinarth (Texas Bar No. 24101412)
 19 (Admitted Pro Hac Vice)
 607 W. 3rd Street, Suite 2500
 Austin, TX 78701

/s/ Jarrod L. Rickard
 Jarrod L. Rickard, Esq., Bar No. 10203
 Katie L. Cannata, Esq., Bar No. 14848
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145

20 *Attorney for Plaintiffs*

Attorneys for Defendant Nathan Park

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 3, 2024